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REPLY TO MONTCLAIR OFFICE

April 28, 2022

Via email and ecf

Honorable Valerie E. Caproni, U.S.D.J.
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Edwin Cortorreal*, 17 Cr. 438 (VEC)

Dear Judge Caproni:

We write respectfully to request that the Court consider accelerating the schedule for the *Daubert* hearing if the Court's schedule allows. The parties have conferred and coordinated with our experts, and everyone is available for a hearing the week of June 13, with the caveat that one defense witness, Dr. Dan Krane, is only available on that Friday, June 17. The parties and the witnesses are also available for a hearing the week of July 25.

If the Court can accommodate a June 13 hearing, the parties respectfully request that the following schedule be endorsed:

- May 16: Witness lists
- June 3: Exhibits
- 3500 to continue to be produced on a rolling basis

If the Court's schedule cannot accommodate the earlier date, the parties respectfully request that the following schedule be endorsed:

- June 20: Witness lists
- July 15: Exhibits
- 3500 to continue to be produced on a rolling basis

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Thank you for your consideration of this request.

Respectfully submitted,

JEAN D. BARRETT
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Attorneys for Edwin Cortorreal

By: Jean D. Barrett
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cc: All counsel via ecf